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Attorneys for Trans'-Global LLC, a California
 limited liability company

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

TRANS'-GLOBAL LLC, a California limited
 liability company,

Plaintiff,

vs.

LIA DETOMASI; MARIO P. DETOMASI; LORI
 THORNTON; JEFFREY DONATI; DANIEL
 DONATI; MARCIA M. MELNIKOFF;
 LAWRENCE BERTOLUCCI; LIA DETOMASI
 as trustee of THE BERTHA A. DONATI TRUST
 FBO MARC DONATI; LIA DETOMASI and
 MARIO P. DETOMASI as trustees of THE
 DETOMASI FAMILY TRUST u/a/d June 28,
 2005; LORI THORNTON and LIA DETOMASI,
 as trustees of THE BERTHA DONATI TRUST
 u/a/d September 30, 1996; MARC DONATI and
 VICKIE DONATI, as trustees of THE BERTHA
 A. DONATI TRUST; PAUL DONATI, ELISA M.
 DONATI KLUNIS and STEVE DONATI, as
 trustees of THE JULIO A. DONATI FAMILY
 TRUST u/a/d June 21, 2002; MARCIA M.
 MELNIKOFF as trustee of the TESTAMENTARY
 TRUST UNDER THE WILL OF JOSEPHINE
 BERTOLUCCI; MARCIA M. MELNIKOFF and
 LAWRENCE BERTOLUCCI as trustees of THE
 LAWRENCE R. BERTOLUCCI REVOCABLE
 LIVING TRUST dated June 6, 2007; KI MOON
 HONG; MYUNG S. HONG; SEO OK OH; SOOK
 OH, SUN YE OH, SUMI KIMURA, GEORGE
 KIMURA and DOES 1-25, inclusive,

Defendants.

**AND ALL RELATED CROSS-CLAIMS and
 COUNTER-CLAIMS**

Case No. C13-2149 WHO

**STIPULATION TO EXTEND DEADLINE
 FOR MEDIATION AND RESCHEDULE
 CASE MANAGEMENT CONFERENCE &
 ORDER**

ADR LOCAL RULE 6-5

Honorable William H. Orrick

Wendel, Rosen, Black & Dean LLP
 1111 Broadway, 24th Floor
 Oakland, California 94607-4036

1 Plaintiff Trans'-Global LLC, a California limited liability company ("Plaintiff"),
 2 Defendants Lia DeTomasi; Mario P. DeTomasi; Lori Thornton; Jeffrey Donati; Daniel Donati;
 3 Marcia M. Melnikoff; Lawrence Bertolucci; Lia DeTomasi As Trustee Of The Bertha A. Donati
 4 Trust FBO Marc Donati; Lia DeTomasi and Mario P. DeTomasi As Trustees Of The DeTomasi
 5 Family Trust U/A/D June 28, 2005; Lori Thornton And Lia DeTomasi, As Trustees Of The Bertha
 6 Donati Trust U/A/D September 30, 1996; Marc Donati And Vickie Donati, As Trustees Of The
 7 Bertha A. Donati Trust; Paul Donati, Elisa M. Donati Klunis And Steve Donati, As Trustees Of
 8 The Julio A. Donati Family Trust U/A/D June 21, 2002; Marcia M. Melnikoff As Trustee Of The
 9 Testamentary Trust Under The Will Of Josephine Bertolucci; Marcia M. Melnikoff And Lawrence
 10 Bertolucci As Trustees Of The Lawrence R. Bertolucci Revocable Living Trust Dated June 6,
 11 2007 (hereinafter collectively referred to as the "Owner Defendants"); Ki Moon Hong; Myung S.
 12 Hong; and Sumi Kimura and Cross-Defendant Thomas G. Palmer, Jr. (hereinafter collectively
 13 referred to as the "Operator Defendants") (Plaintiff, Owner Defendants, and Operator Defendants
 14 together, the "Parties), by and through their undersigned counsel of record, hereby submit the
 15 following stipulation to extend the deadline for mediation and the December 2, 2014 case
 16 management conference in the above-captioned matter.

17 WHEREAS, on June 3, 2014, the Parties appeared for a scheduled case management
 18 conference, discussed the status of the case and agreed to participate in mediation. The court and
 19 Parties discussed the appropriate time frame for conducting mediation, the court referred the
 20 matter to the ADR Unit for mediation, to be completed by October 31, 2014, as agreed upon by
 21 the parties. A further case management conference was set for December 2, 2014, after the
 22 mediation deadline.

23 WHEREAS, shortly after the June 3, 2014 case management conference, the Parties jointly
 24 selected a mediator and reported the selection to the ADR Unit. The Parties participated in a July
 25 10, 2014 pre-mediation conference call with the mediator and selected a mutually agreeable
 26 mediation date of October 8, 2014.

27 WHEREAS, plaintiff obtained competitive bids for the necessary soil and shallow
 28 groundwater removal, has provided the bids to the other Parties, selected a contractor and

1 scheduled the work for later this year.

2 WHEREAS, the San Mateo County Department of Environmental Health ("County"),
3 which is overseeing plaintiff's environmental investigation and remediation notified plaintiff of
4 groundwater contamination at a nearby San Francisco Public Utility Commission groundwater
5 well and requested additional groundwater investigation at plaintiff's property. Plaintiff
6 previously obtained one groundwater sample from the site, which did not show the presence of dry
7 cleaning solvents above the laboratory method detection levels.

8 WHEREAS, on September 4, 2014, in preparation for mediation, plaintiff's counsel
9 provided the other Parties with summary of the past and anticipated future environmental costs
10 incurred or to be incurred by the plaintiff. Plaintiff's counsel noted that if contamination was
11 identified in the groundwater, then additional environmental investigation and remediation costs
12 would likely be incurred and plaintiff's estimates would have to be revised.

13 WHEREAS, on September 11, 2014, plaintiff submitted to the County a Groundwater
14 Investigation Work Plan. Plaintiff has scheduled the additional groundwater investigation to begin
15 on October 22, 2014 and will have results in the field.

16 WHEREAS, on September 26, 2014, certain defendants indicated that they are not willing
17 to enter into a partial settlement or one that does not include a complete release of all past and
18 future claims. Plaintiff responded that it was not willing to enter into a complete and final release
19 of all claims given the potential for significant additional groundwater investigation and
20 remediation costs. The Parties agreed that it would be in their best interests to postpone mediation
21 until such time as plaintiff's additional groundwater investigation determined whether further
22 groundwater investigation and/or remediation would be necessary.

23 NOW, THEREFORE, the undersigned Parties stipulate and agree to this request that the
24 court postpone the October 31, 2014 mediation deadline until January 31, 2015. The extension
25 will give the plaintiff time to conduct the scheduled groundwater investigation and determine if
26 additional costs will be necessary. The case management conference presently set for December
27 2, 2014, should be postponed until a date available on the court's calendar after the newly assigned
28 mediation deadline.

1 IT IS SO STIPULATED.

2 DATED: October 10, 2014

WENDEL, ROSEN, BLACK & DEAN LLP

3
4 By: /s/ Gregory C. Brandt
5 Gregory C. Brandt
6 Attorneys for Trans'-Global LLC, a California
7 limited liability company

8 DATED: October 10, 2014

ANDERLINI & McSWEENEY LLP

9
10 By: /s/ G. Chris Anderson
11 G. Chris Anderson
12 Attorneys for Steven Donati, Paul Donati, Elisa
13 Donati Kunis and Marcia Melnikoff, et al.

14 DATED: October 10, 2014

BOWLES & VERNA

15
16 By: /s/ Ethan K. Friedman
17 Ethan K. Friedman
18 Attorneys for Lia DeTomasi, Mario DeTomasi,
19 Lori Thornton and Daniel Donati

20 DATED: October 10, 2014

SCHUERING ZIMMERMAN & DOYLE, LLP

21 By: /s/ Keith Douglas Chidlaw
22 Keith Douglas Chidlaw
23 Attorneys for Sumi Kimura
24
25
26
27
28

1 DATED: October 10, 2014

HUNSUCKER GOODSTEIN PC

3 By: /s/ Maureen Hodson

4 Maureen Hodson

Attorney for Ki Moon Hong and Myung S. Hong

6 DATED: October 10, 2014

LAW OFFICES OF MICHAEL D. McLACHLAN,
APC

9 By: /s/ Michael D. McLachlan

Michael D. McLachlan

Attorneys for Thomas G. Palmer, Jr.

ORDER

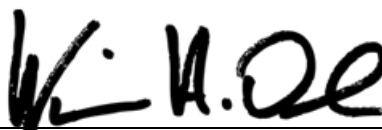
Based on the stipulation submitted by counsel and good cause appearing therefor:

The stipulated request to extend the deadline for completing mediation is GRANTED. The deadline for completing mediation is hereby extended to January 31, 2015.

The further case management conference set for December 2, 2014 is vacated. A further case management conference will be held on February 10, 2015 at 2:00 p.m.

IT IS SO ORDERED.

Dated: October 14, 2014



HONORABLE WILLIAM H. ORRICK
JUDGE OF UNITED STATES DISTRICT COURT